

A Guide to TEFAP for Outlets

Program responsibilities and standards for Wisconsin food pantries, meal sites and shelters participating in The Emergency Food Assistance Program

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**Prepared by
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with the Wisconsin Community Action Program Association (WISCAP)**

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TEFAP ADMINISTRATION

What is TEFAP? The Emergency Food Assistance Program (TEFAP) is a Federal program that helps supplement the diets of low-income households by providing them with nutritious food at no cost through participating food pantries, meal sites and shelters nationwide. In 2002, Wisconsin TEFAP distributed over 11 million pounds¹ of commodities to emergency food providers in all 72 counties to supplement an estimated 12 million pounds of privately donated and purchased food. Nearly 40,000 households received monthly food packages containing commodities and private food from local food pantries. Each month local meal sites and shelters served nearly 145,000 meals that were prepared in part with commodities.

How did TEFAP begin? TEFAP was first authorized as the Temporary Emergency Food Assistance Program in 1981 to help reduce Federal food inventories and storage costs and provide nutrition assistance to low-income families. It was changed to The Emergency Food Assistance Program in the 1990 Farm Bill.

How is TEFAP administered at the state-level? The U.S. Department of Agriculture (USDA) provides food to the Division of Children and Family Services (DCFS) within the Department of Health and Family Services (DHFS) which has primary responsibility for administering TEFAP in Wisconsin. DHFS contracts with the Wisconsin Community Action Program Association (WISCAP) to manage statewide food ordering and monitoring of outlets. DHFS also contracts with the Department of Public Instruction (DPI) to deliver commodities to county drop-off sites with the same trucks that deliver USDA commodities to schools.

How is TEFAP administered locally? DHFS contracts with 16 regional organizations -referred to as Emergency Feeding Organizations (EFOs) - to coordinate local distribution to 211 food pantries, 40 meal sites and 32 shelters that directly serve the public. These 16 EFOs have primary responsibility for the distribution of TEFAP in their regions, which range from 1 to 12 counties. (Visit DHFS' webpage <http://www.dhfs.state.wi.us/Children/hunger/forms.htm> for a current listing of regional EFOs). Their main tasks are to train and monitor existing outlets, identify new outlets, order food, coordinate monthly delivery and pick-up, collect and report data, maintain records, coordinate food drives and food recovery projects, conduct fund-raising, prepare grants for food or equipment, and coordinate volunteers. Some EFOs directly operate their own outlets, while others provide support to outlets operated by churches or other community organizations.

Are all TEFAP commodities surplus food? When TEFAP first began all the food distributed to states was surplus – that is, it was food purchased by the USDA to help stabilize the price of selected U.S. farm products. However, by 1988 stocks of most food held in surplus had been depleted so Congress authorized funds for the purchase of non-surplus commodities for distribution to emergency food providers. Today, TEFAP includes non-surplus products – referred to as “Entitlement” food, as well as surplus commodities – known as “Bonus” food. USDA commodities may include meats, vegetables, fruits, juices, beans, cereals, grains and nuts.

¹ This is equivalent to 9 million NET pounds.

The amount of commodities the USDA offers to individual states depends on how many unemployed persons and low-income persons live there.

- *Entitlement food.* Each year the USDA allocates entitlement funds to each state for the purchase of individual commodities. Every quarter the USDA releases a menu of about 60 available entitlement food items that states can order. WISCAP surveys the 16 regional EFOs quarterly for their recommendations on which specific entitlement foods to order, the quantities and shipment dates.
- *Bonus Food.* The USDA's Agricultural Marketing Service (AMS) regularly purchases surplus domestic agricultural products as part of its price stabilization program. Wisconsin TEFAP receives a portion of these "Bonus" products for distribution to emergency food providers. Unlike Entitlement food, states have very limited influence on the type, quantity, and delivery dates of Bonus foods that AMS purchases.

OUTLET ELIGIBILITY

What are the basic criteria for outlets to receive commodities in Wisconsin? Food pantries, meal sites and shelters that distribute commodities to low-income families must meet the following criteria.

- *Hours of operation.* DCFS' goal is that each TEFAP outlet will be open at least one regularly scheduled day per week to ensure households have reasonable access to food. Regional EFOs will work with TEFAP outlets that are unable to meet this goal to explore whether there are manageable ways to expand hours.
- *Minimum level of non-USDA food.* DCFS' goal is that at least 50% of all food distributed by a TEFAP outlet will be privately donated or purchased food when measured over the course of a year. Regional EFOs will work with TEFAP outlets that do not meet this goal to explore strategies to expand the amount of private food they distribute. The reason for the 50% goal is that TEFAP is intended to supplement the privately donated and purchased food already distributed by emergency food providers rather than serve as a primary source of food. Using TEFAP as a supplement reduces the impact on outlets and families when the volume of commodities inevitably fluctuates.
- *Emergency Access.* Outlets must post emergency instructions for obtaining access to food when the outlet is not open. This could include instructions for contacting the pantry coordinator or a community referral agency (i.e., First Call for Help, 211, social services, law enforcement, etc.).
- *Non-profit status.* Outlets must be government agencies or 501(c)(3) not-for-profit organizations.
- *Two years of operation.* DCFS prefers outlets be in operation at least two years prior to distributing commodities, but may make exceptions for new outlets in underserved areas.

- *Defined service area.* Outlets must have a geographically defined service area, such as a school district, county, zip code, or neighborhood. Service areas help ensure that as many low-income families as possible in each county have access to emergency food without duplicating services.
- *Adequate facility, equipment & storage capacity.* Outlets ideally should have at least one freezer, one refrigerator, good quality shelving, and an adequate, well maintained facility, storage area and equipment. (See Food Storage, page 10).
- *Maximize Access to Disabled.* Outlets must comply with the Americans with Disabilities Act which requires removal of architectural or structural barriers if this can be easily accomplished without great difficulty or expense.
- *Ability to meet program requirements.* Outlets must be able to process client eligibility for TEFAP, provide services and maintain records in accordance with program standards.

What if “privately donated and purchased food” amounts to less than half of all the food we distribute? If your outlet is unable to obtain enough privately donated or purchased food to meet the 50% minimum goal despite significant efforts, DCFS may approve participation in TEFAP as long as the outlet earnestly works with the regional EFO to increase the amount of privately donated and purchased food distributed.

How do EFOs decide whether or not to approve a new outlet for TEFAP? Regional EFOs always welcome inquiries from new or existing pantries, meal sites and shelters that want to know more about TEFAP. EFOs base their decisions to approve new outlets in part on the outlet’s ability to meet the above criteria. However the EFO may also look at such things as whether commodities are already available in the area, where outlet are located, local need, how many eligible people the outlet would serve, whether the outlet will improve access to food or serve more clients, what services the outlet offers, or whether there are sufficient commodities to support new sites.

CLIENT ELIGIBILITY

Who is eligible to receive TEFAP from food pantries? Clients must meet basic income and residency requirements.

- *Income limits.* Income eligibility is determined by self-declaration. To receive commodities in Wisconsin clients must have monthly income below 185% of the federal poverty level for their household size. (Current household income limits are available at DHFS’ website <http://www.dhfs.state.wi.us/>). A household can be a single person or a group of persons (related or not) who live as one economic group and customarily purchase and prepare food together. Assets are NOT counted. Clients must sign the CFS-2001 form each time they receive food to confirm they meet income limits and agree not to re-sell exchange or otherwise profit from the food. Client signatures on the CFS-2001 form also make them legally liable for the accuracy of their declarations – not outlet workers. Pantry workers may

read the CFS-2001 form to any client who is unable to read. (See below for eligibility for migrant, non-English speaking, and self-employed persons).

- **Residency.** Recipients of commodities must be Wisconsin residents and should reside in the pantry's service area, although there is no minimum length of stay. Pantries should not deny services to those who lack evidence of residency, such as new residents, homeless persons or migrants. To prove residency pantries often accept recent bills showing an address, or a driver's license or state ID card. Homeless persons may use the local Social Services office for their address. Once residency is established, pantries do NOT need to re-verify at each visit, but should ask whether any information has changed since the last visit.
- **Identification.** Pantry staff and volunteers should always request ID from clients unless they personally know who they are. You may ask for some proof of dependents. Pantries however cannot require clients to give social security numbers as ID. If a pantry requests a social security number compliance must be voluntary. Clients who will not give a social security number cannot be denied food assistance.

Who is eligible to receive meals from meal sites and shelters? The USDA automatically assumes that all people are income eligible if they seek meals at meal sites, homeless shelters and domestic violence shelters that serve predominately needy people. People who come to meal sites and shelters do not need to declare household income, document residency or provide identification to receive meals. Citizenship status is irrelevant.

Can TEFAP pantries impose other eligibility criteria? Food pantries that distribute commodities agree to only use household income and residency as the basis for determining eligibility for all food they distribute. Federal law prohibits discrimination on the basis of race, color, national origin, sex, age, religion, political beliefs, or disability. In addition state law prohibits discrimination on the basis of employment status. The only times it is reasonable to decline food assistance to a person who is otherwise eligible is if they reside outside the pantry's service area, or if they act in a belligerent or threatening fashion, or appear to be intoxicated or using illegal drugs. Person exhibiting irresponsible behavior may be invited to return when they can be cooperative.

Are migrant families eligible for TEFAP at food pantries? Yes, migrant families that meet TEFAP income limits are eligible. Because migrant earnings fluctuate widely throughout the year migrant households may use either monthly or annual gross income to meet income limits. For this reason, the Spanish version of the CFS-2001 form shows both monthly and annual income limits. Pantries should keep a current Spanish version of the CFS-2001 form on hand.

Can farmers or other self-employed persons use NET income (income after paying business expenses) to qualify for TEFAP at food pantries instead of GROSS income? The USDA requires states to determine financial eligibility for commodities using only GROSS income. DCFS encourages pantries to provide non-USDA food items to needy households whose income is above the TEFAP income limits.

How do food pantries serve non-English-speaking people who request food assistance? Outlets must have a plan for communicating in alternative ways with non-English speaking

persons and other special needs individuals who request assistance. You should know which workers are bi-lingual and you should be familiar with translation services available in your area. Citizenship status is not required for TEFAP eligibility and pantries should not ask about it.

How can food pantries serve home-bound clients and determine eligibility? There are several ways food pantries can serve low-income people who are homebound due to illness, age or disability or who simply cannot come to the pantry during regular hours because of work.

- All pantries must allow authorized persons (proxys) to pick up food for clients if they present a valid proxy note. The note, signed by the client, designates another person as the client's proxy and states the client meets TEFAP income limits. The proxy must show identification and sign the CFS-2001 form attesting to the receipt of food on the client's behalf. The proxy note should be filed with the CFS-2001 form.
- For outlets that make home deliveries, the client simply signs the eligibility form.

Can outlet staff and volunteers receive commodities? Pantry staff and volunteers may receive commodities if they meet TEFAP income and residency requirements. They must read and sign the TEFAP eligibility form and cannot receive preferential treatment or larger food packages than others. Staff and volunteers at meal sites and shelters may receive meals prepared with commodities if it is the outlet's practice to serve meals to workers and the site serves predominately low-income people.

What if a client lives outside a pantry's service area? If a client lives in Wisconsin, but outside your pantry's service area you may serve them, but should encourage them to utilize a food pantry (TEFAP or non-TEFAP) serving the area where they live. If they return the following month, you may decline to serve them at your discretion. Clients from outside your service area may sometimes ask to receive only commodities because their regular pantry doesn't have them. TEFAP pantries should not do this because it encourages clients to disregard pantry service boundaries and commodities are intended to be integrated with private food packages. Although TEFAP is widely available in Wisconsin, DCFS cannot guarantee commodities will be available in every community.

What if you suspect a pantry client is misrepresenting their income or residency? If you have sound reasons to suspect someone is deliberately misrepresenting their income or otherwise providing false information to take advantage of the program, you may request proof or refer the issue to your regional EFO for their help. However, income eligibility is intended to be self-declared, and requiring proof must be reserved only for instances when there are solid grounds – not just suspicions - for doubting a client's truthfulness.

SERVICES TO CLIENTS

Are there guidelines for how clients should be treated? Community standards dictate that all clients should be treated politely, with warmth and respect in a non-discriminating and non-condescending manner. For many people it is both difficult and humiliating to ask for food

assistance and the manner in which they are treated by pantry workers can make the experience easier. Client sensitivity should be part of any orientation for new volunteers and outlets should periodically review the principles with existing workers. Occasionally it may be necessary to reassign volunteers to duties without client contact if they are unable to meet these standards.

Are private interviews required? Interviews afford an ideal time to learn more about a client's circumstances and needs, and to give referral information. Some pantries have sufficient space to interview clients in private rooms, while others do not. In either case, all pantries must have sufficient space between waiting areas and interview areas so clients can provide personal information to workers without being overheard by others. Client information IS confidential and workers must treat it as privileged. Client circumstances must not be shared with other pantry staff unless necessary and never with unauthorized persons.

Are there guidelines for preparing food packages? Yes. Food packages should be as nutritionally balanced as possible and should ideally contain a 3-5 day supply that is adjusted for the size of the household. The actual amount and type of food in each package will of course depend on exactly what and how much food is in storage. Pantries should ask whether clients have dietary restrictions and whenever possible provide foods that meet the cultural, dietary, and religious needs of the household.

What is a “nutritionally balanced” food package? A nutritionally balanced food package contains a meat or protein, fruit and/or fruit juice, vegetables, and grain (bread, rice, cereal or pasta). The USDA's food guide pyramid is available on the internet at <http://www.nal.usda.gov/fnic/Fpyr/pyramid.html> and includes an explanation of the basic food groups and how much of each group constitute a healthy diet.

Can pantries decide whether to give fixed food packages or let clients choose the food? It's up to the pantry to decide what works best for them. Traditionally, food pantries prepare fixed packages ahead of time so distribution goes quickly, but clients can get some items they don't want or need. An increasing number of pantries have become “Client Choice” - allowing families to choose the food they want within limits set for each household size. “Client Choice” pantries usually find there is less waste and that clients only take the food they want. These pantries may give clients a menu of available food (by category) which the client marks with their choices. A pantry worker then fills the order. Some pantries with sufficient aisle space allow clients to walk through with a volunteer and a cart to select food. DCFS encourages your pantry to experiment with client choice to learn first hand if it can both work for you and the families you serve.

When our pantry prepares food packages do we mix commodities with private food or bag them separately? You may do it however you want as long as households get a mix of private food and commodities. Unless you are serving lots of clients whose income exceeds TEFAP income limits (see below), there's no reason to stock or bag commodities separately from private food. There is also no requirement that individuals receive a certain percentage of commodities or private food in a particular food package, though food packages should contain some of each.

How often can clients be served? TEFAP pantries must serve income eligible clients at least once a month. However pantries may serve clients more often than that if they choose. Regardless of how often in a month you serve clients, all food packages you distribute should contain commodities and private food. This does not concern meal sites and shelters which usually serve all clients multiple times in a month.

What if a household has an exceptional need for food, can we give them more than our standard package? Yes, you can give them a larger quantity of food than your standard package or you can invite them to return again later in the month. Food pantries that provide extra food in the same month to families in crisis should have some criteria for deciding if a household's financial situation warrants extra food. All households should be made aware of the policy and pantries should be careful to apply it fairly and in a non-discriminatory manner.

What if a household needs food assistance but their income is too high for TEFAP? Your food pantry may serve households whose income is higher than 185% of poverty – but you cannot include TEFAP commodity items in the food package. Although there are many good reasons why a higher income family may require food assistance, federal law requires states to set a GROSS income limit for receipt of commodities. This standard does not apply to persons who visit meal sites and shelters because the USDA assumes that anyone seeking a meal at these locations is automatically income eligible.

OUTREACH & REFERRAL

Are outlets required to publicize their services? All outlets must post an exterior sign noting the days and hours of operation, the main phone number, and where to call after hours in an emergency. Outlets should also make reasonable efforts to inform low-income people in the community of their services, hours, and eligibility criteria. Examples of outreach include articles in organizational newsletters and newspapers, public service announcements in the media, contacting community agencies that make referrals like social services, school counselors, churches, police, and other low-income serving organizations, placing posters in stores, Laundromats, and libraries, etc. Outreach to potential clients is especially important when an outlet has a large service area or serves people in more than one community.

Why is client referral so important? Households seeking food assistance are frequently eligible for other assistance programs that may provide much needed resources and reduce the need for emergency food. This includes nutrition programs (food stamps, WIC, school meals, elderly meal sites, meals-on-wheels, SHARE), as well as non-nutrition programs like health care, energy assistance, W-2 cash assistance and child care, child support, disability assistance, and tax credits. Even non-nutrition programs can improve household food security by reducing other expenses and leaving more money in the household budget to purchase food at grocery stores.

The more you know about your clients' needs and the more appropriate information you share with them, the greater the likelihood you can help improve their circumstances. DCFS encourages all TEFAP outlets if possible to schedule brief private interviews with all new clients

and to visit with existing clients at least once a year learn about their needs and to provide referral information. Outlets with limited time or staff can at least hand to clients written resource materials or put these in with food packages on a regular basis. *Wisconsin Connections* is a useful guide containing 20 one-page summaries of key assistance programs that many clients are eligible for. Pantries can give clients information on one or several programs or the entire packet. It is available on the internet at <http://www.uwex.edu/ces/connections> and is updated every January by UW Cooperative Extension. The Guide is also useful to educate staff and volunteers about available assistance programs. When pantry workers encourage clients to apply for programs it helps them to overcome stigma and reluctance. Over time it may help reduce pantry demand. Pantries may also want to consider inviting staff from these programs to visit your location to talk with clients or conduct eligibility interviews.

DELIVERY TO OUTLETS

How often do outlets receive commodities? Food is delivered once a month except in July when DPI conducts an inventory of its warehouses in Eau Claire and Madison.

How do EFOs determine the amount of food an outlet receives? Each county is offered a percentage of the commodities available to the entire state based on the number of low-income people and the number of unemployed people who live there. Regional EFOs will usually give food to outlets based on the number of people served monthly or similar criteria. EFOs also may adjust the amount of food for an outlet based on the outlet's inventory, local demand, availability of private food, and storage capacity.

How do outlets physically receive delivery of commodities? The USDA delivers TEFAP food directly to two Central Storage warehouses - in Madison and Eau Claire –which are under contract with the Department of Public Instruction (DPI). From there trucking companies hired by Central Storage make monthly deliveries to individual counties. In counties with only one TEFAP outlet commodities are usually delivered directly to the outlet. In counties with multiple TEFAP outlets commodities are usually delivered to a central drop off location – like a food bank, warehouse or large pantry. From there the regional EFO will either deliver it to individual outlets or outlets will pick it up. It is the responsibility of staff and volunteers at the receiving site to unload and store the food.

What if food is damaged, “out of condition”, or the quantity is wrong at the time of receipt? USDA commodities are very high quality and rarely in poor condition. However, when outlets take receipt of commodities they should always verify the kind, quantity and condition of the food using the CFS-2000 form. “Out-of-condition” products are those that come from the processor contaminated, deteriorated, spoiled, infested or with packaging defects. Cans that are leaking, bulging, have sharp dents, or rust on the seams are also considered out-of-condition. Any discrepancies (shortage, overage, damage or out-of-condition) must be noted on the PI-1412 form and signed by both the driver and outlet representative. Damaged or out-of-condition food must be accepted from the trucker, but should be reported immediately to your regional EFO.

FOOD STORAGE AND SAFETY

What are the basic storage requirements for TEFAP food? All TEFAP outlets must...

- Store food on racks or pallets that keep it at least 6 inches off the floor, 4 inches from the wall and 2 feet from the ceiling.
- Keep rooms and shelving clean, well-maintained, and free of toxic items (like cleaning supplies, paint, or hazardous chemicals) that could contaminate food.
- Keep storage areas free of pests - like rodents and insects. Outlets must either contract with a professional pest control company or regularly inspect storage areas themselves, taking all necessary steps to prevent and safely control any infestations that might occur.
- Insulate any heat generating pipes or ducts.
- Ensure the food storage area is secure to prevent access by unauthorized persons.
- Maintain food within optimal storage conditions, including monitoring and logging temperatures of freezers, refrigerators and dry storage.
- Follow UW Cooperative Extension food safety recommendations.

What temperatures are required to safely store food? “Frozen” food must be stored at or below zero degrees Fahrenheit. “Refrigerated” food must be maintained between 35 and 40 degrees Fahrenheit. Food requiring “dry” storage must be kept between 40 and 70 degrees Fahrenheit. Maintaining food within these temperatures prevents spoilage and the growth of bacteria and helps food retain its optimal flavor, quality, color, and texture. At higher temperatures some products can deteriorate or spoil. For instance, the yeast in Bakery Mix packages can activate above 70 degrees Fahrenheit, causing packages to swell or break.

What if the storage area gets warmer than 70 degrees in the summer? You may need to increase ventilation, install air conditioning, or add fans. If your refrigerators and/or freezers are in the same room as dry storage, they may be contributing to the problem due to the large amount of heat they give off. If possible, keep refrigerators and freezers in a different room than dry storage, and make sure heat generating pipes and ducts are fully insulated.

What is FIFO? Your inventory should be managed so that food received first is the first to be distributed. This is referred to in warehouse management as FIFO – First In, First Out. The best way to ensure this happens is to mark cases when they arrive with the month & year of receipt. It also helps to rotate the oldest stock to the front where it will be used first and place recently received food above, below or to the back.

How long may commodities be kept in storage? Commodities should not be kept in storage longer than six months from the date of receipt to ensure food retains its optimal quality, freshness, flavor, color and texture. Outlet coordinators should manage their inventory carefully so that food does not remain in storage too long. Clearly marking cases with the month and year of receipt will help you to ensure food is distributed in a timely manner. If you find your

inventory becoming too large, ask your regional EFO to reduce the volume of your monthly deliveries.

What if products pass their expiration date? Cases of USDA commodities may contain an expiration date. If a product passes its expiration date you should contact your regional EFO for guidance. All outlets should also carefully inspect non-USDA donated food products to make sure they are not outdated. The primary concern with expired or outdated food products is not necessarily with food safety, but rather concern that food may lose optimal flavor, color, texture or nutrition. There should never be expired items if the pantry coordinator is conscientious about labeling incoming cases with the month and date of receipt and carefully monitors the inventory.

Can I re-freeze thawed food if a freezer malfunctions? It depends on the type of food, and how long it has thawed. If in doubt, err on the side of safety. A decision table with guidance on whether or not to re-freeze specific foods is available on-line from Purdue University at <http://www.cfs.purdue.edu/safefood/foodsafety/perishabletable.html>.

What if stored food becomes damaged, spoiled, or stolen while in our possession? It's important not to distribute food that is severely dented, has torn packaging, is damaged by water or insects, is out-of-condition, or has thawed and cannot safely be refrozen. If food is lost due to damage, infestation, spoilage or theft while in your possession, you should promptly report it to your regional EFO. If no one is available then contact WISCAP (608-244-0742) or DCFS (608-266-3362). Do not dispose of damaged or spoiled food until your EFO tells you to, unless there is concern for safety. If the loss is more than \$100 and is the result of negligence the EFO could be responsible for its replacement value. Losses can be kept to a minimum by regularly checking storage temperatures, establishing good building security, routinely inspecting for spoilage, controlling for rodents and insects, and maintaining a cool, clean, and dry storage area.

Where can I find more information on each commodity? The USDA's website at <http://www.fns.usda.gov/fdd/facts/hhpfacts/hp-tefap.htm> has fact sheets on TEFAP products, including package size, storage requirements, preparation, recipes, and nutritional content.

Where can I find additional information on food safety? Purdue University has comprehensive internet materials on food safety at <http://www.cfs.purdue.edu/safefood/foodsafety.html>.

RECORD KEEPING

What records must TEFAP outlets maintain? Federal and state rules require outlets to keep certain basic records to document client eligibility and the receipt, storage and inventory of food. The following records must be kept for three years at either the outlet or the regional EFO.

- ***CFS-2001 Forms.*** Signed CFS-2001 forms (Eligibility Certification for TEFAP Commodities) documenting client eligibility and receipt of commodities from pantries.

- *Service Statistics.* Pantries must maintain a count of the number of adults, children, and households they serve each month. Meal sites and shelters must record the number of meals served monthly. Your regional EFO collects these figures each month.
- *Non-USDA food.* Pantries must track the pounds of non-USDA food they collect each month. They may report an exact weight if they weigh the food they collect and distribute or they may provide an estimate using a reasonable method. For instance, you might weigh ten food bags or boxes packed with private food to get an average weight per package. Then multiply the number of bags or boxes of private food you give out by the weight per container. Your regional EFO collects these figures each month.
- *Temperature, cleaning, inspection logs.* Outlets must log at least weekly the temperature of each freezer and refrigerator and the dry storage area to document those optimal conditions are maintained. Outlets also must record the dates they clean the premises and the dates they make visual inspections for spoiled food and pests. Some outlets keep temperature, cleaning and inspection logs on a single sheet. Others post temperature logs on each unit inspected for ease of recording. Regional EFOs inspect these logs whenever they conduct site reviews of outlets.
- *Outlet reviews.* Outlets should keep a copy of any on-site reviews conducted by the regional EFO, including recommendations.
- *Monthly inventory reporting (optional).* Most regional EFOs require outlets to provide a case count of commodities remaining at the end of each month to better monitor local inventories.
 - a. Use the CFS-2002a form if the regional EFO requires you to report only the total number of unopened cases of TEFAP product in storage at the end of the month.
 - b. Use the CFS-2002 form if the regional EFO requires you to report the total number of unopened cases of each individual TEFAP product in storage at the end of the month.

Where can I get copies of TEFAP forms? Check with your regional EFO or go to DHFS' webpage at: <http://www.dhfs.state.wi.us/Children/hunger/forms.htm> to download copies of current TEFAP forms.

PROHIBITED ACTIVITIES

Can outlets give clients political or religious materials during food distributions? No. TEFAP outlets may not engage in political or religious activities when distributing food. Political candidates may not make appearances at these times and campaign signs and materials may not be evident. Bags or boxes advertising candidates or political causes may not be used for food packages containing commodities. Outlets may not require or pressure clients to attend political or religious meetings or to join an organization as a condition of receiving assistance.

Can TEFAP outlets ask clients for donations? Outlets that receive federal commodities may not ask clients to donate money, materials or services in exchange for food. Outlets may not post

signs requesting “voluntary” donations nor place donation containers in the area where clients are served.

Can TEFAP outlets choose to serve some people but not others? Federal and state laws prohibit discrimination on the basis of race, color, national origin, sex, age, religion, political beliefs, or disability. State law prohibits discrimination on the basis of employment status. All outlets must post the sign “AND JUSTICE FOR ALL” where it can be seen by all clients. Please contact your regional EFO for additional copies. As already noted, it is reasonable to decline services to an otherwise eligible client if they behave in a belligerent or threatening fashion or appear to be intoxicated or using illegal drugs. Pantries also may decline to serve clients who live outside their service area.

Can outlets or clients sell commodities? Commodities are intended solely for private consumption by eligible recipients. The sale, trade, exchange or other disposal of commodities or use of commodities for personal gain is strictly prohibited and subject to federal and/or state prosecution.

Can outlets repackage commodities? TEFAP commodities must be distributed only in their original packaging to ensure food safety. Repackaging is prohibited without the express written authorization of either DCFS or USDA. Due to the time and expense required to meet stringent USDA food safety requirements, repackaging is rarely warranted.

Can outlets give or trade commodities among themselves? A TEFAP outlet may only transfer commodities to another TEFAP outlet with the approval of the regional EFO. A TEFAP outlet may never transfer or trade commodities with another outlet that has not been approved to distribute TEFAP.